

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Citadel Securities Americas Services LLC,

Plaintiff,

vs.

Vincent Prieur,

Defendant.

Civil Action No. 1:22-cv-05185

**EMERGENCY MOTION FOR
TEMPORARY RESTRAINING ORDER**

Plaintiff Citadel Securities Americas Services LLC, an affiliate of the global Citadel Securities group of companies (“Citadel Securities”), hereby moves the Court for a Temporary Restraining Order pursuant to Federal Rule of Civil Procedure 65. In support of this Motion, Citadel Securities states:

1. Citadel Securities seeks immediate injunctive relief to maintain the status quo pending a private mediation initiated by Citadel Securities (and potential arbitration) pursuant to the parties’ Mediation/Arbitration Agreement. Citadel Securities former executive Vincent Prieur has joined a key competitor that was deceptively and surreptitiously formed by other former Citadel Securities executives in violation of their obligations to Citadel Securities. Prieur was intimately involved over the course of several months in the research and development of Citadel Securities’ entire highly confidential crypto trading and market making strategy. Unless enjoined by the Court, Prieur threatens to use Citadel Securities’ highly confidential information to assist this unlawful enterprise in competing unfairly with Citadel Securities and causing Citadel Securities irreparable harm.

2. On Friday, September 16, 2022, Citadel Securities filed in the Circuit Court of Cook County, Illinois, County Department, Chancery Division, among other things, (1) a Verified Complaint for Injunctive and Other Relief against Vincent Prieur (attached hereto as Exhibit A), (2) an Emergency Motion for Temporary Restraining Order (attached hereto as Exhibit B), and (3) a Memorandum in Support (attached hereto as Exhibit C). Two days later, Citadel Securities filed five accompanying exhibits (attached hereto as Exhibit D).

3. On Monday, September 19, 2022, a hearing on Citadel Securities' Emergency Motion for Temporary Restraining Order was set for 10:00 a.m. CT on Friday, September 23, 2022, before Judge David B. Atkins.

4. On Friday, September 23, 2022, just over one hour before the scheduled hearing, Prieur informed Citadel Securities that he had removed the action to federal court and that the hearing with Judge Atkins would therefore be stricken.

5. Because Citadel Securities' need for emergency injunctive relief remains, Citadel Securities moves the Court for a Temporary Restraining Order against Prieur for the reasons set forth in the Memorandum of Law Citadel Securities filed in state court, which is attached hereto as Exhibit C.

6. Citadel Securities respectfully requests for the opportunity to be heard by Judge Kness on its motion on Monday, September 26, 2022, or as soon thereafter as Judge Kness is available.

Date: September 23, 2022

Respectfully submitted,
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